

AGO Advisory Task Force on Community Benefits: Meeting 2

MAY 22, 2017

HEALTH CARE DIVISION
OFFICE OF ATTORNEY GENERAL MAURA HEALEY
ONE ASHBURTON PLACE
BOSTON, MA 02108



Agenda

- 1. Advisory Task Force Goals & Process
- 2. Presentation on DPH's CHI Program, Including Updated Health Priorities
- 3. Discussion of Role of AGO Guidelines in Encouraging Meaningful, High Impact Investments in Documented Health Priorities



Advisory Task Force Goals and Process

Assessing Community Health Need

Meeting 2 (May 22)

Coordinating Responsive Investments

Meeting 3 (June 28)

Reporting,
Evaluation &
Learning

Meeting 5 (Sept 5)

Community Engagement

Meeting 4 (July 24)

Financial Assistance/Debt Collection Policies

Meeting 6 (Oct 18)

Review Working Draft of Updated Guidelines

Meeting 7 (Nov 20)



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Commonwealth of Massachusetts Department of Public Health

Revision of the Determination of Need Regulation 105 CMR 100.000

AGO Advisory Task Force on Community Benefits
May 22, 2017

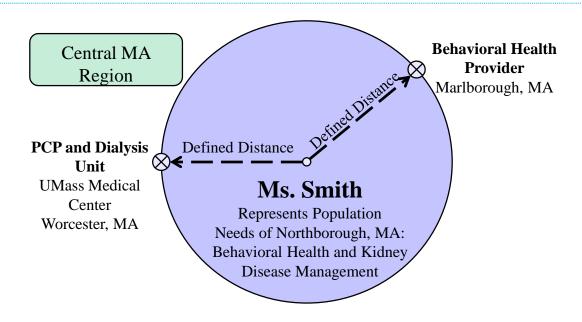


Outdated and Outmoded

Problem Statement: Created in 1971 by the MA Legislature, MA's DoN regulation has been outpaced by a rapidly evolving healthcare market and currently does not align with DPH's core mission.
 1971: DoN established. ✓ Providers: Care largely provided in standalone, not-for-profit hospitals or small group practices. ✓ Payment: Fee-for-service or cost-based reimbursement. Rate setting commission set public rates. ✓ DON: Played a critical role in protecting MA from state overspending on new technologies and duplicative services. Goal was to prevent saturation through non-duplication of services.
 2016: Post-Chapter 224 and ACA health reform. ✓ Providers: Significant provider consolidation. Complex health systems that closely control patient referral patterns. Increased reliance on innovation through technologies and services. ✓ Payment: Systems taking on increased risk and no government rate setting. ✓ DON: Objective has been the non-duplication of services, rather than incentivizing competition on basis of value. Increasingly out of alignment with DPH mission (i.e. population health) and state goals for delivery system transformation.
Result: Despite these substantial changes in health care over the past 45-years, due to regulatory stagnation, DoN has become outdated and outmoded.



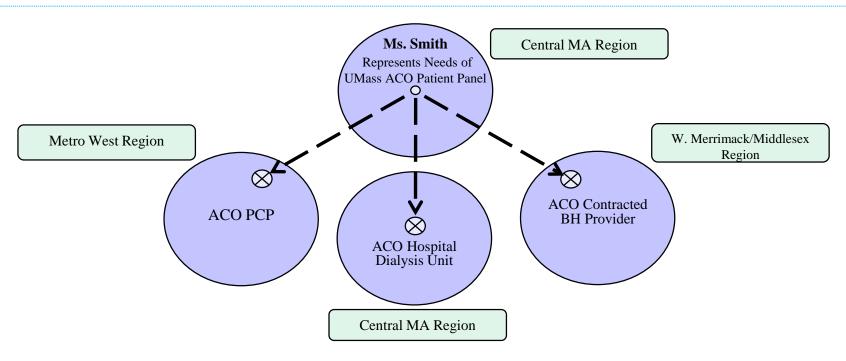
Traditional Health Planning (1970-2012)



- ☐ Map population health needs of defined, limited geographic area
- Measure excess/scarcity of needed services within area
- ☐ Historical role of DoN:
 - ✓ To allow government to *monitor and control costs* of large projects and new technologies (era of rate setting and cost-based reimbursement)
 - To empower government to **regulate excess/scarcity** through geographic distribution of services



Potential ACO View of Future Role of DoN and Health Planning



- ACO "owns" patient risk question for ACO is how to best manage risk by ensuring access to needed services at lowest cost
- ACOs could argue that DoN not needed as ACOs will be best situated and at risk to manage and plan for the needs of their patient panel
- Question is access to services within the system, not excess/scarcity within a defined geographic area



False Choice

Neither scenario is reflective of today's health care market.
No health care system today represents an ACO that is fully "at-risk" – largely definitional or currently represent payor/provider contracts with limited to no downside risk (i.e. providers not yet truly at-risk for patient panel).
Regardless of the speed at which ACOs become the new paradigm – or whether ACOs even succeed at all – it is clear that the market is moving towards providers taking on more risk.
Public health – leveraging this significant state executive branch tool – is uniquely situated to create incentive for population health management that will allow health systems to play an active role in addressing the Social Determinants of Health.



DoN Health Priorities: Impacting the Social Determinants of Health

Health Impact Pyramid



Frieden T. American Journal of Public Health | April 2010, Vol 100, No. 4

- □ The environments in which we live, work, learn, and play have an enormous impact on our health. Re-shaping people's physical, social, economic, and service environments can help ensure opportunities for health and encourage healthy behaviors; however, we currently allocate the fewest resources to influencing these factors.
- ☐ For systems to successfully take on more risk (i.e. value-based health care), **systems will need to develop an expertise and focus on population health**, <u>both</u> at the patient panel level, as well as at the community level (e.g. understanding how mental health, substance abuse, housing, environment, and other community-level factors impact their patient panel's outcomes).
- □ DoN can help create capacity for systems of care to bridge to this new reality.



How do we build a bridge between health care and public health through DoN?

CHI Today:

- No coordinated disbursement of the more than \$170M in CHI investments committed between FY06 through FY16;
- No standardized documentation or evaluation to ensure spending directly contributes to increased health outcomes and lowered THCE;
- Not consistently publicly planned or competitively procured with unclear DPH role;
- Flexible community engagement standards;
- Often small, uncoordinated investments across many issue areas;
- □ Does not fully leverage DPH's ability to build population health expertise across health care system, failing to incentivize providers' adoption of population health strategies <u>both</u> at the patient panel level and community level needed to successfully take on desired risk.

CHI Tomorrow:

- ☐ Standardized, coordinated CHI investments with enhanced accountability and reporting, ensuring critical dollars are contributing to the improvement of community health;
- □ Strong community involvement with funds disbursed through a transparent process from provider organizations with final DPH approval;
- Clear community engagement expectations that set "gold standard" for community-based planning;
- ☐ Larger and/or coordinated approaches to CHI investments that ensures targeted investments with high-value returns across a community;
- Establishes a public health framework that will allow DPH to support a social determinant of health and health equity approach to community health investments. This approach will balance investments in both state "Health Priorities" as well as targeting resources towards responding to individual Community Health Needs Assessments and identified local health disparities.



Current CHI: Does not require alignment of CHI planning with state AGO and federally mandated community benefits processes

Federally Mandated

Community Health Improvement Planning (3 year cycle)

- Assess & prioritize local health needs
- Engage community and key local stakeholders to identify evidence based interventions



OUTPUT

- List of priority community health needs
- List of selected interventions

Lack of Synergy

- Many similar health needs assessments are occurring with no alignment
- The same stakeholders are being approached separately for the CHIP vs DoN processes

- Separate health priorities are identified
- Separate evidence based interventions are proposed and selected

Current DoN/CHI Planning

- 1. Assess & prioritize local health needs
- 2. Engage community and key local stakeholders to identify evidence based interventions



OUTPUT

- List of priority community health needs
- · List of selected interventions



What is Government's Role?

DPH's role is balancing these two perspectives: needs of individual systems of care and the state's health priorities. This role reflects DPH's mission.

Individual System's Needs

Health Priorities

- □ Individual System's Needs: Applicants can best demonstrate the *Triple Aim* (IHI model): 1) need within their system by their patients, 2) competitive price, and 3) demonstrable "public health value".
- □ **Health Priorities**: DPH establishes executive branch "Health Priorities" based on the underlying social determinants of health that drive health outcomes, inequity, and costs.
- □ **DoN Role**: The question for public health becomes how proposed projects address and balance both a system's needs and the broader communities responses to the underlying social determinants of health the "Health Priorities".



CHI from a System Transformation Approach: Collaboration and true alignment between ongoing state AGO and federally mandated community benefits processes and CHI will:

Federally Mandated

Community Health Improvement Planning (3 year cycle)

- Assess & prioritize local health needs
- Engage community and key local stakeholders to identify evidence based interventions

Future DoN/CHI Planning

- 1. Assess & prioritize local health needs
- 2. Engage community and key local stakeholders to identify evidence based interventions

OUTPUT

- List of priority community health needs
- List of selected interventions

OUTPUT

- List of priority community health needs
- List of selected interventions

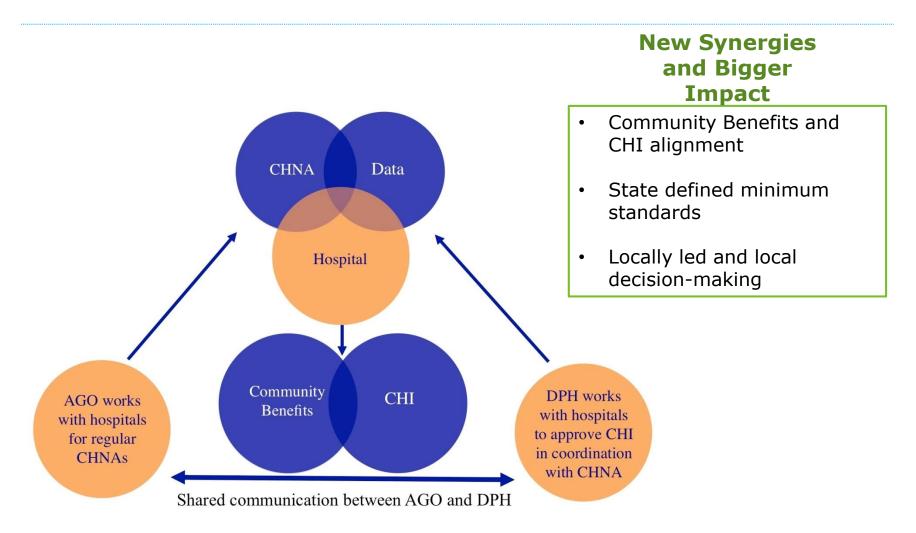
New Synergies

- Provide opportunities to leverage existing community needs assessments
- Minimize duplication of stakeholder engagement efforts
- Standardize definitions, approaches, and evaluation of community engagement

- Identify potential alignment of priority health needs
- Select similar, or complimentary interventions
- Leverage joint resources for larger community impact



CHI from a System Transformation Approach





Health Priorities: Impacting the Social Determinants of Health

Based on a comprehensive review process, the following DoN Health Priorities were selected:							
Socio-Cultural Environment	■ Violence and Trauma						
Built/Physical Environment	□ Employment						
Housing	□ Education						
These Health Priorities:							
1) Set a long-term framework built around issues that will not change in the short-term;							
2) Support successful transition to greater risk;3) Support the state's current health and human services priorities;							
				Allow for greater collaboration and synchroniza	tion of investments regionally/statewide; and,		
Encompass critical, ongoing community-based	work.						
	Socio-Cultural Environment Built/Physical Environment Housing Health Priorities: Set a long-term framework built around issues to Support successful transition to greater risk; Support the state's current health and human sealth and human sealth and human sealth						

^{*}Social Determinant of Health framework and definitions are based on the report: Countering the Production of Inequities: A Framework of Emerging Systems to Achieve an Equitable Culture of Health. Available at: http://preventioninstitute.wixsite.com/producingequity



DoN Health Priorities: Current Issue Focus

- ☐ DPH considers the six (6) Health Priorities as the structural framework within which specific evidence-informed strategies live and evolve based on funding decisions made by health care systems and their partners through an analysis of current trends, issues, and opportunities for alignment across state and local initiatives.
- ☐ As DPH looks to launch the first iteration of this new approach, strategies to impact and address the Health Priorities will include but not be limited to strategies that directly align and emphasize EOHHS goals of:

Massachusetts EOHHS Priorities Department of Public Health Priorities DPH will support DoN Applicants and community partners with new data tools Health Reduce opioid related Optimal health and well-being for all people in overdose deaths Massachusetts, supported by a strong public health Improve access to infrastructure and healthcare delivery healthcare Decrease health The mission of the Massachusetts Department of Public Health (DPH) is to prevent illness, injury, and premature death; to ensure access to high quality public health and health care services; and to promote wellness and health disparities **DETERMINANTS DISPARITIES DATA** Resilience Independence We provide relevant, timely access to data for DPH. We focus on the social researchers, press and the determinants of health - the We consistently recognize Increase the number of Increase job skills and general public in an effective conditions in which people and strive to eliminate health individuals who live safely life skills training manner in order to target are born, grow, live, work and disparities amongst disparities and impact age, which contribute to populations in Massachusetts, Increase utilization of in the community outcomes. health inequities. wherever they may exist. Reduce individual and participant directed **EVERYDAY EXCELLENCE** family homelessness services Increase permanence for Increase educational PASSION AND INNOVATION children in state care or attainment INCLUSIVENESS AND COLLABORATION custody



DoN Health Priorities: Current Issue Focus

Accordingly, and consistent with the stated EOHHS/DPH Priorities, the following **four (4) Issue Priorities** are included in the Health Priorities Guideline.

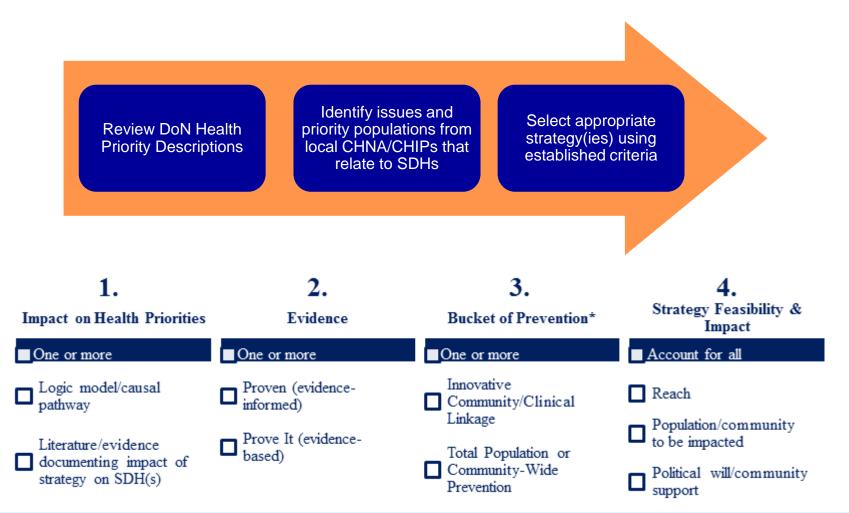
- 1) Substance use disorders (SUDs)
- 2) Housing Stability/Homelessness
- 3) Mental health and wellness
- 4) Chronic disease with a focus on Cancer, Heart Disease and Diabetes

These issues are:

- 1. Trending negatively,
- Represent issues that are driving mortality/morbidity and health care cost, and
- 3. Are either a social determinant of health (e.g. housing stability/homelessness) or are issues that are sustainably addressed using a social determinant of health approach (e.g. prevention of heart disease and diabetes requires addressing opportunities for physical activity and access to healthy food).



DoN Health Priorities: Selecting Strategies that Impact the Social Determinants of Health



^{*} Auerbach, John. "The 3 buckets of prevention." *Journal of Public Health Management and Practice* 22.3 (2016): 215-218.



DoN Health Priorities: Future DoN investments will remain consistent with the current DoN focus on community-based strategies

Patient Approaches	Innovative Community-Clinical Linkages	Policy/Environmental and/or Community Wide Strategies
 Asthma NEAPP Guidelines-Based Care Establish an Asthma Registry Access asthma severity for all asthma patients Provide an Asthma Action Plan for all asthma patients Appropriately prescribe inhaled corticosteroids for all patients with persistent asthma Encourage all asthma patients to get a flu vaccine Assess all asthma patients for tobacco smoke exposure and refer to cessation services as needed Assess asthma control for all asthma patients Review medications, technique, and adherence at each follow-up visit Recommend ways to control exposures to allergens, irritants, and pollutants that make asthma worse 	 Provide CHW-led multi-trigger, multi-component asthma home visiting for high-risk patients which address both asthma management and environmental trigger remediation. Provide low-cost supplies that reduce asthma triggers in the home (e.g, HEPA vacuum cleaners, mattress covers) and educate families on how to use supplies Provide comprehensive school and Head Start-based asthma programs which address asthma education, case management and environmental/indoor air quality issues 	 Provide support to private and public housing landlords and property managers interested in adopting a smoke-free rule in multi-unit housing Enforce anti-idling and school IPM laws Promote school Indoor Air Quality through the Promoting Policies for Asthma in Local Communities (PALC) Schools initiative Promote Integrated Pest Management through the PALC IPM initiative

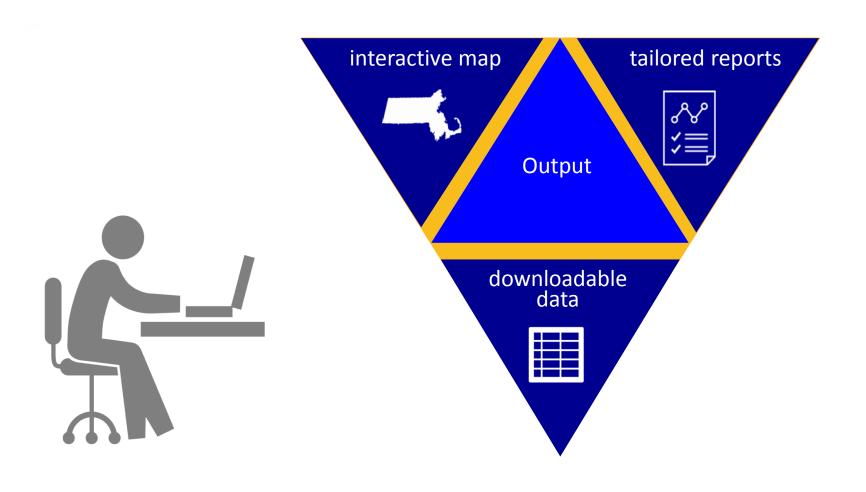


Summary of CHI Changes

- CHIs will establish a public health framework allowing DPH to support a social determinant of health and health equity approach to community health investments. This approach will balance investments in both state "Health Priorities" as well as targeting resources towards responding to local CHNAs and identified local health disparities.
- DPH will now have a role in how the community is engaged and how data and information are used in CHNA/CHIP processes creating opportunity for aligning community benefits determinations with the types of strategies funded through CHIs.
- Through guidelines developed by DPH, CHIs (and by association CHNA/CHIPs) will have to meet community engagement standards.
- CHI changes support the rationale and operation of a new CHI Statewide Initiative supporting coordinated local CHIP efforts, system wide evaluation and resource support to underserved areas of the Commonwealth.



Population Health Information Tool (PHIT): DPH's new tool for Community Health Needs Assessments



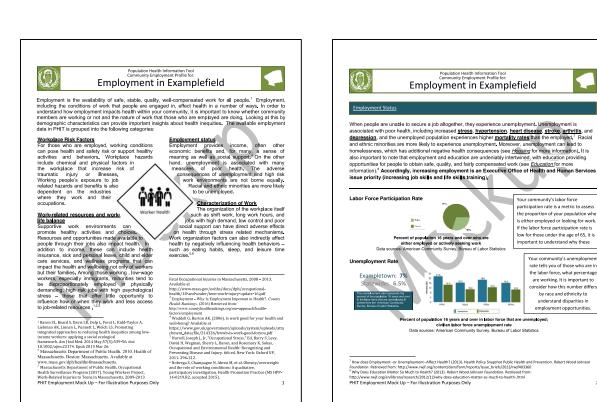


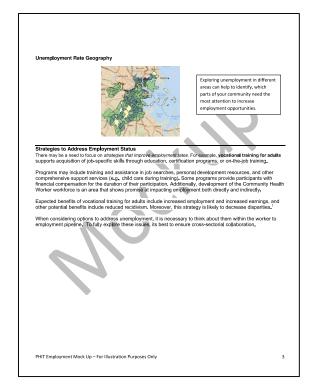
Population Health Information Tool (PHIT): Tailored Reports Consistent with the DoN Health Priorities

- Six (6) reports for each community containing:
- Description of the Social Determinant of Health (SDH)/DoN Health Priority
- 2. Measures of the SDH
- 3. How the SDH impacts health
- 4. Health behaviors associated with SDH
- 5. Health outcomes associated with SDH

Explicit reference to health equity throughout

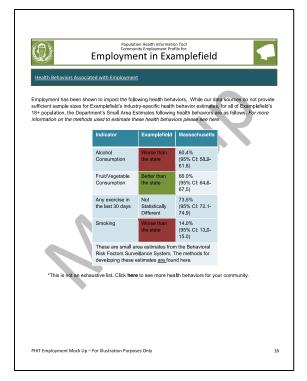
Population Health Information Tool (PHIT): Tailored Reports Consistent with the DoN Health Priorities (Employment Mock-Up)

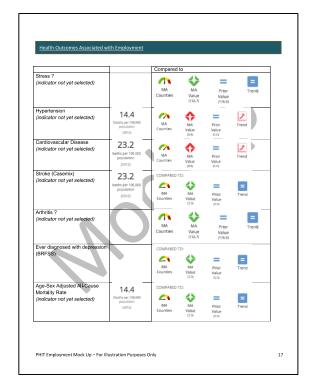




Population Health Information Tool (PHIT): Tailored Reports Consistent with the DoN Health Priorities (Employment Mock-Up)









Process

- □ DPH's DoN reform was informed by a comprehensive year-long review and robust public engagement process.
 - ✓ Eight (8) statewide public meetings;
 - ✓ Three (3) opportunities for public comment on the regulations and the accompanying guidelines;
 - ✓ Over 200 meetings and interviews with stakeholders, sister agencies, and content experts ranging from members and staff of the state legislature, local public health departments, community coalitions, and leading health care academics, to architectural and legal firms, public health advocates, health systems, payors, physicians, nursing homes, and freestanding ambulatory surgery centers; and,
 - ✓ Over 3,500 staff hours.



Summary

Significantly streamlines and simplifies DoN regulations (reduces regulation by 50%), reduces administrative burdens, makes common-sense reforms, and enhances cross-agency collaboration and coordination;
Modernizes DoN to reflect today's health care market by incentivizing value-based, population health-driven competition;
Increases transparency and objectivity by insisting on real community engagement
Adds true accountability by requiring post-approval reporting on public promises made by DoN applicants;
Drives community investments towards the social determinants of health;
Meaningfully infuses public health into DoN , supporting successful health care reform and provider transitions to greater risk.

Thank you!

Commissioner Monica Bharel, MD, MPH Ben Wood, MPH

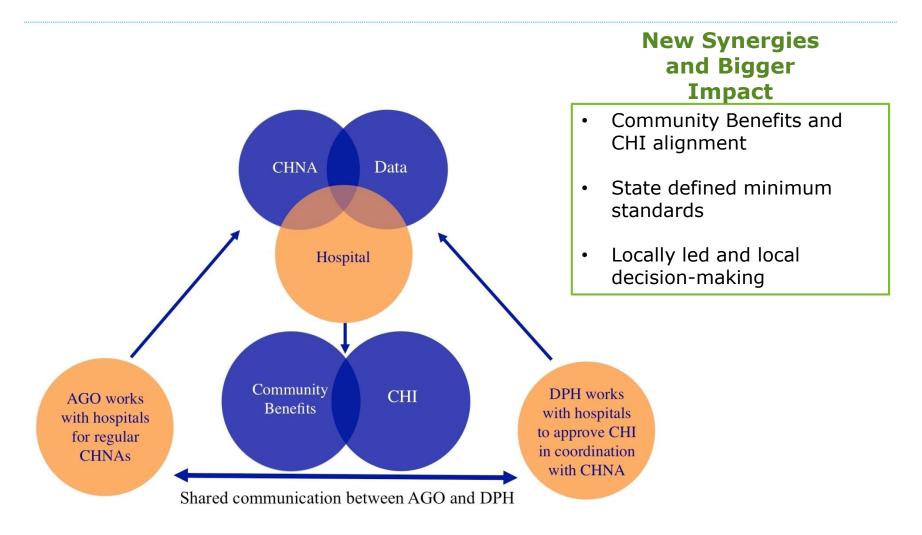
Massachusetts Department of Public Health

P: 617-624-5200 | E: monica.bharel@state.ma.us

P: 413-586-7525 | E: <u>ben.wood@state.ma.us</u>



CHI from a System Transformation Approach





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- 1. Advisory Task Force Goals & Process
- 2. Presentation on DPH's CHI Program, Including Updated Health Priorities
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Discussion Questions

- How do we best approach standards for meaningful, high impact investments in social determinants of health?
- How can DPH's six health priorities be helpful in the Community Health Needs Assessment process? In filers' processes for developing and funding responsive programs?
- Is the term "Community Building" from the IRS helpful in assessing needs or reporting on investments related to social determinants? Why or why not?
- What are other points in the updated DoN process that present opportunities for alignment with Community Benefits?



Useful Information

Next meeting: Wednesday, June 28th, 2-4 pm
Conference Rooms 2 & 3
21st Floor, One Ashburton Place
Boston, MA 02108

Topic: Potential for Improved Coordination
Among Filers and Regional Collaboration

Questions? Contact Project Manager Elana Brochin at (617) 963-2387